



Deval L. Patrick, Governor  
Timothy P. Murray, Lt. Governor  
Jeffrey B. Mullan, Secretary & CEO



---

## MEMORANDUM

TO: Jeffrey B. Mullan, Secretary and Chief Executive Officer  
Richard Davey, Rail & Transit Division Administrator

CC: Joe Landolfi, Assistant Secretary  
Susan Quinones, Chief of Staff  
Catherine Lynds, Rail & Transit Division Chief of Staff  
David Mohler, Director of Planning  
Monica Conyngham, General Counsel  
John Englert, Acting Deputy Rail & Transit Division Administrator  
Jocelyn Moroney, Transportation Program Planner

FROM: Clinton Bench, Deputy Executive Director  
Office of Transportation Planning

DATE: May 5, 2011

RE: Comprehensive Examination of SRTA Administration and Operations

---

In January 2011, Massachusetts Department of Transportation (MassDOT) Secretary & CEO Jeffrey Mullan and Rail & Transit Division Administrator Richard Davey ordered that a review of administrative, financial, and operating procedures and performance of the Southeastern Regional Transit Authority (SRTA) be conducted. Three primary reasons contributed to this decision:

1. Over the course of the previous five years, staff at MassDOT and its predecessor, the Executive Office of Transportation (EOT), had observed a lack of responsiveness of SRTA to the mobility needs of its customers. In particular, numerous complaints had been raised publicly about an unusually high rate of trip denials for demand-responsive service customers. Other complaints had been raised regularly in public forums about the lack of fixed-route service during evenings, weekends, and to growing employment and commercial hubs in the SouthCoast region.
2. On September 15, 2010, the SRTA Board of Directors dismissed its former Administrator, Joseph Cosentino. This resulted in the absence of any executive leadership at SRTA, given the remaining staff complement of only an Executive Secretary and receptionist. This dismissal occurred in the midst of a process to distribute the Request for Proposals for the Authority's comprehensive operations

contract about which MassDOT expressed significant concerns relating to transparency and opportunities for competition.

3. On November 4, 2010, the Federal Transit Administration (FTA) completed its Triennial Review of SRTA, which found a substantial number of deficiencies with respect to federal regulations compliance. These deficiencies were found in the following subject areas: Financial, Technical, Satisfactory Continuing Control, Procurement, Debarment and Suspension, Planning/Program of Projects, and ADA.

Secretary Mullan and Administrator Davey requested that Clinton Bench, Deputy Executive Director of the MassDOT Office of Transportation Planning (OTP), lead a group of subject matter experts from the Rail & Transit Division and multiple MassDOT Enterprise Services, in conducting the review. Jocelyn Moroney of OTP staff has also served as a primary coordinator of this effort. As of this update, MassDOT has collected over 130 documents from SRTA, its current contract operator, the Union Street Bus Company (USBC), the Southeastern Regional Planning and Economic Development District (SRPEDD), the FTA, and other sources. These documents detail many of SRTA's procedures and policies, as well as their performance financially and operationally.

Approximately 20 subject matter experts from throughout MassDOT have been engaged in review of these documents, and in some cases, have even made site visits to the property to collect information and meet with staff and stakeholders. OTP is especially appreciative of the contributions of a number of MBTA staff members for whom doing work outside the MBTA service area may be unprecedented. This review has provided MassDOT an excellent opportunity to show the value of sharing expertise across former agency lines. Additional technical memoranda and white papers written by MassDOT (including MBTA) staff covering observations and recommendations specific to their areas of expertise are on file and effectively serve as an appendix to this document.

This memorandum is intended to serve as a summary of MassDOT staff observations of problems with SRTA's administrative, financial, and/or operating practices and procedures. Some recommendations are also made of potential corrective actions that MassDOT could take immediately in its role as SRTA's fiscal reporting authority to the Auditor of the Commonwealth and steward of both State Contract Assistance and matching funds for federal aid to SRTA. In some cases, comprehensive solutions to identified problems are not yet evident and require additional collaboration between the Rail & Transit Division and SRTA in the coming months.

This report is made at a critical juncture in the process of hiring a new Administrator for SRTA, as applications were due to their administrative offices on 31 March 2011. The necessary collaboration noted above between MassDOT and SRTA makes the hiring of a competent transportation or public administration professional to the SRTA Administrator position essential. If there is any common ground that SRTA stakeholders generally claim, it is a perception that the authority itself is little more than an empty

shell – a pass-through for federal and state financial assistance – one that contracts with same private company that has operated bus service on the SouthCoast since the early part of the last century.

The contents of this memorandum were presented to the Chairman and Vice Chairman of the SRTA Advisory Board on April 25, 2011. Currently, Mayor Scott Lang of New Bedford serves as the Chairman and Mayor William Flanagan of Fall River serves as the Vice-Chairman. As a result of these meetings, it was determined that Administrator Davey would serve in an advisory role on the Administrator Selection Subcommittee of the Advisory Board. It was also determined that Administrator Davey would provide guidance on required content of the Request for Proposals for Management Services (bus operations) to be distributed by the SRTA Board during the following month. This content was outlined in a letter from Administrator Davey to SRTA's Acting Administrator, Arthur Frank, on April 27, 2011.

Many of the below observations are informal, but they are intended to paint a picture of a transit authority in serious crisis. It is one that, to a casual observer, may appear to be "doing its job." Indeed, the buses go back and forth on the same routes they have followed for decades, and the contract operator keeps them in proper working order. But beyond these basic functions, it is a transit authority where the voice of the customer is generally ignored, operator oversight is almost non-existent, and the most vulnerable of customers are often unable to access any service when they need it.

### **1. The private operations contractor is technically proficient in fixed-route bus operations and maintenance**

- USBC maintains an excellent maintenance operation with highly skilled and dedicated staff who perform an unusual amount of work in house and keep tight controls over associated materials.

*The Massachusetts Department of Public Utilities (DPU) has provided its inspection history record for USBC. There were no violations discovered during any of the detailed inspections. In on-site inspections by MassDOT staff, maintenance-related files were organized, accessible and in a secure location. Bus history records followed a common chain of custody between the maintenance work records and the parts inventory system.*

- Fixed route buses are generally on time, are clean, and are operated by courteous and knowledgeable individuals who, in many cases, have over a decade of experience.

*Observations of both Fall River and New Bedford district buses conducted by MassDOT contract staff revealed no deficiencies in customer service. Fare collection appeared to be conducted in a thorough and proper manner and operators appeared to take their responsibility for on-time performance seriously. No safety-related issues were noted with respect to operator driving habits and the process of passenger boarding and alighting. Further, the contract operator's Drug and*

*Alcohol policy appears to comply with federal regulations, was recently updated using qualified third party vendors, and their zero-tolerance policy is strongly reinforced by the principal.*

- Handling of cash from fares collected on-board vehicles appears properly managed, with few exceptions, including one related to fares collected on demand-response vehicles

*The accounting department takes cash room counts and reconciles against the GFI farebox data. The reconciliation and variance worksheets, journal tapes and reports appear to be reasonable and within norms. The initial deposit of cash from each fixed-route bus to the secure money room also appears to be performed responsibly, with minimal direct handling by staff.*

*Cash fares on demand-responsive services, however, are deposited by customers into a simple locked “bread box” with a small slit on the top. Each evening, the boxes are opened, counted and reconciled against the driver’s worksheet by dispatchers in a relatively open area of the USBC executive offices. The cash is then routed to the money counting room for an independent count and bank deposit.*

- **Recommendation:** Best practice is to operate both revenue systems – for fixed-route buses and demand response vans -- within a secure counting room. The boxes should only be opened by counting room staff within the secure area. Counting outside the secure room is a known risk. Once the counting room can accommodate demand-responsive fareboxes, the contract operator’s transportation department should independently report to the Accounting Department what the revenue should be for a given day without counting or opening any farebox. MassDOT Rail & Transit Division and OTP staff can assist SRTA with proper changes to protocol and programming of necessary capital funds to accommodate physical improvements at the garage.

**2. The Authority, itself, is almost entirely unequipped to carry out its statutory management and oversight responsibilities, thereby allowing the contract operator to drive much of SRTA’s policy development and define institutional relationships**

- For years, the authority has been led by Administrators with limited prior experience in transit operations and public administration.

*The most recent administrator, who now appears to be nearly unanimously scorned by Advisory Board members and the contract operator’s principal, was in fact a 30-year close personal friend of the principal and is reported to have been a key figure in his political campaigns. (The principal has previously served as a state representative.) It is apparent that when their relationship went sour, however, their feud helped propel the Authority into a leadership tailspin.*

- **Recommendation:** SRTA should suspend its current search process for a new Administrator and work with the MassDOT Rail & Transit Division to identify an experienced local transit operations and/or administration professional to serve as a full-time interim administrator for a period of six months. During this time, the SRTA Advisory Board should secure a professional staffing consultant to identify a competitive salary range (including both a minimum and maximum salary) and conduct a nationwide search for a permanent professional administrator with substantial public administration and/or transit operations experience. Any committee created to review applications should include a peer administrator of a Massachusetts RTA, the Rail & Transit Division Administrator (or his designee), and a representative of the Amalgamated Transit Union. The interim administrator should not be considered as a candidate for the permanent administrator position.
- Given the lack of transit and/or public administration expertise in the Administrator position, the authority has functioned for years primarily on the backs of the Administrator's secretary and the receptionist.

*As a result of the lack of appropriate staffing, the Executive Secretary has been expected to serve as the finance director and Affirmative Action coordinator, while the receptionist tried to manage the fulfillment responsibilities for transportation access passes. This has resulted in effectively no attention to civic engagement and marketing, and little attention to intergovernmental coordination. Customer complaints and requests for service improvements/changes are generally routed directly to the operations contractor with no clear protocol for follow-up by SRTA staff.*

- **Recommendation:** MassDOT concurs with recent recommendations made by Brockton Area Transit Authority (BAT) Administrator Ray Ledoux that new positions for a comptroller, a grants and compliance officer and a customer service/Americans with Disabilities Act (ADA) coordinator be created immediately. As noted above, MassDOT also recommends that an interim administrator be named immediately for a period of six months. This interim administrator would be responsible for hiring at least these three new staff members.
- With little staff and limited expertise, oversight of the contract operator is minimal and inadequate.

*With the exception of major capital purchases such as buses, nearly all purchases and other financial transactions are conducted by the contract operator, and complete records are maintained only by their employees. It is reported that capital and operating expenses are often improperly accounted for, and purchases of questionable value for transit operations are often not cleared in advance with Authority staff. However, business and operations practices are not clearly defined*

*or stipulated in the operating agreement between SRTA and its contractor, USBC. Therefore, it is problematic to apply and enforce any sort of standard when it was not defined or included in the agreement.*

*The current operating agreement also relies on course of dealing between the parties rather than expressly stating the parties' obligations in the contract itself. From an oversight standpoint, this makes it difficult for SRTA to audit contractor compliance. Also, uncertainties in contracts as a rule are interpreted against the drafter, so SRTA would be at a disadvantage if disputes arose concerning the interpretation of the contract requirements.*

➤ **Recommendation:** Better defining acceptable business practices, either explicitly or by reference to applicable industry standards, is highly encouraged in the upcoming Request for Proposals (RFP) for management services. Specific issues to be addressed therein include, but are not limited to:

1. Adequate remedies for non-compliance on the part of the contract operator that are enforceable by Massachusetts General Law;
  2. Description of appropriate risk or cost control mechanisms – previous draft RFP language stating that SRTA will provide “all operating funds necessary,” without assigning risk, is not acceptable and could compound the liability of the authority in lawsuits (such as the USBC personnel matter currently filed in Bristol Superior Court);
  3. Identification of component elements of the management fee – for example, the existing contract operator collects an annual management fee of over \$250,000, but the company's owner/principal also serves as a full-time General Manager with a separate salary and pension benefits;
  4. Clearly defined (or enhanced) reporting obligations on the part of the contract operator – for example, NTD reporting is identified generally in the existing draft RFP, but there is a lack of specificity about key performance indicators of importance to the Advisory Board that are consistent with industry state-of-the-practice;
  5. Proper alignment of specific respondent qualifications (and descriptions of past performance) with the operating responsibilities identified elsewhere in the RFP – the existing draft RFP doesn't require specific enough information for an apples-to-apples comparison to be done of different proposals, thereby allowing respondents to provide cursory information on topics like ADA compliance.
- SRTA is in violation of FTA fiscal management requirements by not maintaining a long-term financial plan.

*As required by federal Metropolitan Planning Regulations, the Southeastern Massachusetts Metropolitan Planning Organization (SMMPO) and its staff housed at SRPEDD serve SRTA in the production of the Transportation Improvement Program (TIP), which covers a short-term (four year) horizon. However, it appears that SRTA*

*uses the TIP in lieu of a long term (20-year horizon) financial plan. The Federal Transit Administration published guidance in June 2000 titled “Guidance for Transit Financial Plans,” and in the first sentence of the document it states: “Sound financial planning helps ensure the financial health of transit agencies and the quality of service that they are able to provide.” Therefore, it is imperative that SRTA review its practices and adopt a rigorous approach to long-term financial planning, as “[a] continually updated financial plan is the centerpiece of sound capital investment planning for any transit agency.”*

- **Recommendation:** SRTA should utilize a portion of their FTA Section 5303 planning funds for the development of a twenty year plan that includes capital and operating plans for the agency as a whole. The work should be conducted or overseen by SRPEDD, acting as staff to the SMMPO and on behalf of SRTA. Additionally, the plan should include the following: funding sources and revenue forecasts; proposed project capital budgets; other planned capital projects; and annual operating and maintenance expenses for the agency’s existing system and expansion, if proposed.

### **3. With little authority oversight, staff have been reported to engage in a number of unethical activities which may also be violations of federal and state regulations and/or law**

- Use of authority property for personal reasons has been reported by multiple persons associated with SRTA.

*One past audit noted improper use of mobile telephones by the contract operator’s staff, which was confirmed by the contract operator. Reportedly, some phones were distributed to family members of the principal without a valid business purpose. Multiple persons have reported taking out-of-state shopping trips in a SRTA vehicle assigned a USBC employee. Reports of the Chief Financial Officer using an authority vehicle to plow private property have also been received.*

- **Recommendation:** SRTA should work cooperatively with the MassDOT Rail & Transit Division and the SRTA contract accountant to develop a vehicle use policy that addresses fleet assignment, acceptable personal use, and ensure compliance with IRS Taxable Commuting Expense provisions (e.g. the benefit of personal use of an authority vehicle may be considered taxable, while some commuting expenses may be tax deductible.)
- The majority of other domicile vehicles assigned to the contract operator’s managers are unmarked and display private passenger vehicle license plates instead of SRTA or commercial plates.

*Of the 19 active non-revenue vehicles, 10 are assigned to the Maintenance department and the remaining 9 to the transportation and administration*

*departments. Of the nine, five are late model sedans, including a Ford 500 sedan purchased for the former SRTA Administrator Lou Pettine. His successor did not like this vehicle and a new Jeep Grand Cherokee was purchased but the Ford 500 was not traded in or returned.*

- **Recommendation:** Of the 19 vehicles, 12 are unmarked cars with passenger plates. While it is allowable under MassDOT Registry of Motor Vehicles (RMV) rules for a commercial enterprise to have unmarked cars with passenger plates, no legitimate reason has been presented by SRTA for such a large proportion of its vehicles to be unidentifiable as public property. All domicile vehicles and maintenance vehicles should prominently display a SRTA logo on both sides and utilize SRTA license plates. A limited number of vehicles (no more than 2 per division) could reasonably be unmarked with passenger plates, but these should be general motor pool vehicles, not assigned to a specific staff member, and used for legitimate business purposes only.
- Customer complaints regarding demand-responsive service are handled directly by the service provider instead of SRTA administrative staff.

*Complaints from demand-responsive service customers are directed to the relevant division office of the contract operator (Fall River or New Bedford), which also handles their reservations. During a MassDOT site review of the contract operator's demand-responsive dispatching protocols, the principal and the dispatchers for both divisions were asked about their data on trip denials and customer complaints. It was reported that since September 2010, there had been less than 10 trip denials and no customer complaints received. However, this is in stark contrast to the SRTA Trapeze report submitted to FTA for 2008, 2009 and first eight months of 2010 reporting about 800 trip denials during that period. (The FTA Triennial Report also stated that round trip denials were being counted as one denied trip, thereby underreporting the actual denials by one half.) This verbal report received during the site visit is also in direct conflict with the Trapeze-generated report for the period September 2010 through March 30, 2011, which lists 68 trip denials. It is not known if this figure refers to single trips or round trips.*

- **Recommendation:** All customer complaints, especially those relating to civil rights, including access for persons with disabilities, should be handled solely by SRTA administrative staff. As noted above, MassDOT recommends that a grants and compliance officer and a customer service/Americans with Disabilities Act (ADA) coordinator be hired as soon as possible.
- Overzealous surveillance techniques employed by the contract operator risk creating a culture of fear among employees and appear to be a violation of Massachusetts General Laws.

*MassDOT lauds efforts to defend against frivolous litigation such as fraudulent personal injury claims on board vehicles. MassDOT also acknowledges that public*



*awareness of surveillance on SRTA property can serve as a deterrent to violent crime. However, the current use of audio recording devices on board vehicles appears to be a violation of personal privacy standards defined in Massachusetts General Law. Further, undercover surveillance of known officials with legitimate business purposes on board vehicles or at SRTA facilities is of suspect intent, and as such, MassDOT officials who were subjects of such surveillance at the New Bedford Terminal during February 2011 have provided cause for concern.*

- **Recommendation:** Audio surveillance on board buses should be discontinued in accordance with Massachusetts General Laws. Further, clear notices in all languages required under the SRTA Title VI program should be prominently placed in any vehicle and at any facility where video and/or audio surveillance is being conducted. In addition, SRTA should work with the MassDOT Rail & Transit Division and a qualified public security consultant to develop a policy for implementation by the Advisory Board regarding the acceptable use of surveillance equipment.

#### **4. The Authority and its Advisory Board function with apparent disregard to federal and state requirements for public involvement**

- The bylaws governing the SRTA Advisory Board are outdated, contributing to functional conflicts with the Commonwealth's open meeting law and modern public expectations of transparency.

*The Advisory Board bylaws appear to be missing key procedural language regarding how the Board functions. For example, the membership of the Board is not enumerated. This is important due to the fact that at every meeting in 2010, less the meeting held on August 19, 2010, the Board went into closed Executive Session. Requests to enter Executive Session were made by non-Board members and non-Board members were present in Executive Sessions. Another example is the vague language on quorums and voting.*

*Meeting agendas and minutes are also not always available for reproduction. Furthermore, in some instances, meeting agendas failed to indicate discussions that later occurred at corresponding Advisory Board meetings. An example of this is the Board's response to the Crosby Report on quasi-public agencies at the January 14, 2010 meeting. Another important example is the establishment of a committee to examine and discuss the upcoming RFP to contract for the operator of SRTA's bus service at the March 18, 2010 meeting. Of particular concern is the September 15, 2010 Advisory Board meeting when the Administrator of SRTA, Joseph Cosentino, was terminated. Minutes of this meeting are not available from SRTA -- such an important event should be referenced in reproducible minutes.*

- **Recommendation:** The Advisory Board should engage its staff counsel in a thorough review of the bylaws with respect to clarity in operating procedures and

consistency with current Massachusetts General Law. Special attention should be paid to the Open Meeting Law (M.G.L. c. 30A, §§ 22). Further, upon hire of additional staff, it should be ensured that multiple persons are skilled at recording minutes at Advisory Board meetings so that they can be prepared and later reproduced upon request in compliance with the Open Meeting Law.

- Customers and other residents, visitors, businesses, and employees are effectively discouraged from providing input at meetings of the Advisory Board

*During the past year, the Advisory Board became frustrated by the number and length of complaints being raised by customers at their meetings, and requested that Authority counsel propose a solution. According to the Advisory Board minutes of June 24th, a motion was adopted that requires a member of the public who wishes to address the Board send a letter to SRTA, so that person can be added to the agenda. Meanwhile, open Meeting Law only stipulates that a meeting be noticed 48 hours in advance. The combination of these two factors could easily discourage active participation or make it entirely impossible for the public to make comments at meetings. Further, the Board's bylaws are silent on public participation and the adopted policy on public participation had not and is still not published on meeting notices, meeting agendas or SRTA's public website. Therefore, the manner in which the Board adopted this policy and enforces it is dubious at best. Further, the Board bylaws are not published on SRTA's website, though the membership of the Board is published, albeit a seemingly out of date listing.*

- **Recommendation:** The requirement for written advance notice to speak at meetings of the Advisory Board is overly burdensome and is not employed by its counterpart SMMPO, nor by the Board of MassDOT, of which SRTA is a legal component. Thus, the advance notice requirement should be eliminated.
- SRTA has violated its own policy for public involvement when instituting service changes.

*In 2010, SRTA rerouted the heaviest ridership route in the New Bedford district to better serve a large supermarket. This change was instituted without an opportunity for public comment and following a routing not recommended by SRPEDD. Approximately 30 stops lost direct service, requiring a number of patrons to walk further to the rerouted service.*

- **Recommendation:** While MassDOT agrees that SRTA acted appropriately to pursue direct service to a major new commercial development in New Bedford, it appears that the planning and public outreach expertise offered by SRPEDD was not utilized, even though federal funding is provided to SMMPO for this work. The above recommendation for a customer service/ADA coordinator to be hired would help address this problem, as would a clearly defined relationship and reporting structure for SRPEDD transit planners working as staff to the SMMPO on behalf of SRTA. Other RTAs and their counterpart MPOs can provide

template agreements for technical services to be provided by Regional Planning Agency (RPA, in this case, SRPEDD) staff. MassDOT's OTP can direct the SRTA administration and Advisory Board to regions that can serve as a model in this regard.

- Key stakeholders, especially advocates for disabled, elderly, and low-income customers, have lost confidence in SRTA's responsiveness to public comments and in its ability to provide adequate access to jobs, education, medical services, and commerce.

*MassDOT staff meetings with social service and other advocacy groups have universally produced accounts of requests to the Administrator and to the Board for consideration of service changes that go ignored. These requests have included extended hours of service and better access to key employment and medical hubs. These advocacy groups have generally confirmed that they have "given up" on asking for service that their clients need and consistently express a sense that "the contractor will only do what he wants to do anyway, and the Board will just listen to what he says."*

*There are presently no service delivery policies or service standards that are used to measure on-time performance, crowding standards, cost recovery by route, or service area coverage. There also appears to be no on-going program to review route performance, or to solicit comments from the riding public in general regarding route or service changes, other than service reductions.*

- **Recommendation:** SRTA should request that a substantial portion of their FTA Section 5303 planning funds be directed to the development of a modern service delivery policy by SRPEDD. This policy would identify performance measures and service standards, and institute an ongoing service planning process that would result in the institution of service changes on at least a biennial basis. The process should be conducted by SRPEDD, acting as staff to the SMMPO and on behalf of SRTA. The contract operator should be included in the process as a stakeholder that would identify functional obstacles to implementation and assess costs of service changes. However, determination of proposed service changes should be driven exclusively by SRPEDD and SRTA administrative staff, with ultimate approval authority resting with the Advisory Board.

## **5. Access for persons with disabilities is regularly denied**

- SRTA operates in violation of the FTA's reasonable advance notice protocol for demand-responsive trips.

*While disability access brochures distributed to the public suggest that demand-responsive rides can be requested up until the day before a trip is needed, the reality is that customers must call a minimum of 6 days in advance to be assured a fair*

*chance of obtaining a trip at the desired time. This is a gross violation of FTA regulations and the Americans with Disabilities Act. Customers describe being pressured by dispatchers to provide such unreasonable advance notice and are scared to upset these dispatchers – without them, many customers' mobility is completely cut off.*

*The amount of demand-responsive service provided by the contract operator appears to be fixed on all weekdays and every Saturday, regardless of fluctuations in demand. This likely contributes to the violation of federal regulations suggested in the FTA's recent triennial review. Further, it appears that during school release periods in one of the contract operator's divisions, even less vans are available for demand-responsive service as drivers are pulled to operate special supplemental trips. It has been suggested that demand-responsive customers are discouraged from requesting trips during that time.*

- **Recommendation:** SRTA should retain an ADA transportation consultant familiar with FTA rules and regulations to review all aspects of the demand-responsive operation. As an initial task, the consultant should determine the typical weekday and weekend demand for service by hour of day (including latent demand) to develop a baseline for necessary minimum van availability. The contract operator may assign drivers to both fixed route and demand-responsive trips over the course of a workday, but in no cases should demand-responsive service suffer because of a peak in demand for fixed-route service.
- Protocols for scheduling and dispatching demand-responsive trips are antiquated and inadequate given current demand, and may contribute to the long lead time required of customers making reservations.

*Reviews of reservations and dispatch operations were made at both the New Bedford and Fall River divisions of the operations contractor. Despite having the modern scheduling software system Trapeze, dispatchers take calls manually, record them on paper, and then transfer them into the scheduling software system as time permits. Call-backs are also done manually to confirm trips with customers. One phone line was being utilized for all demand-responsive trip request calls. The New Bedford division dispatchers then manually schedule the trips while Fall River dispatchers more fully utilize the Trapeze system to batch trips. Drivers use paper manifests for their trips, which makes schedule adjustments difficult over the course of a service day. The vehicles are not equipped with Automated Vehicle Locator (AVL) technology which, if installed, could assist the dispatcher with real-time monitoring capability. The primary means of communication between dispatchers and drivers is two-way radio.*

- **Recommendation:** The failure of the contract operator to utilize the capabilities of the computer scheduling software limits the demand-responsive service to scheduling and reporting based on dispatcher memory. With correct use of the software, capacity can be adjusted by day or time period, and trip history can be

scanned or electronically referenced to help predict daily demand in advance. Additional on-call drivers should be available and called in if needed. This would give schedulers greater ability to add runs when needed and supervisors time to arrange for additional drivers and runs.

- Customer facilities in New Bedford are designed with substantial disregard for persons with disabilities.

*While the vehicles themselves appear to provide reasonable accommodations to persons with disabilities, little attention is given to persons using wheeled mobility devices at the primary bus terminal in New Bedford. One primary path of travel through to the bus platforms is inaccessible to such customers because of concrete barriers. Meanwhile, to access the terminal waiting area itself, persons using wheeled mobility devices risk rolling backwards into a busy street when opening the main door.*

*In what is perhaps the most egregious violation, there is no accessible path of travel from the door of the SRTA administrative offices to the area where Transportation Access Pass photo IDs are processed – in fact, it is impossible for a customer using a wheeled mobility device to exit the main door of the office on their own.*

*Passenger Assistance Training (PAT), Sensitivity Training, etc. for drivers is performed in-house by the contract operator's employees. It is unclear if the materials used were from a certified entity or created by the contract operator. It is also unclear if there was any retraining or refresher courses offered.*

- **Recommendation:** SRTA should retain an ADA transportation consultant familiar with FTA rules and regulations to review all aspects of facility and vehicle accessibility. This review should address all elements of services provided to the customers: counter service, vehicles pulling to the curb, ramp/lift deployment, mobility device securement, stop announcements, wayside announcements, etc. The MassDOT Rail & Transit Division and OTP staff, along with SMMPO staff at SRPEDD, can assist SRTA with programming of necessary capital funds to accommodate physical improvements. The Rail & Transit Division can also direct staff of SRTA and its contract operator to training programs regarding sensitivity to persons with disabilities. The Advisory Board should commit to repair all ADA deficiencies and develop an action plan to bring the system into full compliance.